

Joel S. Cohen, P.C.
Attorney-at-Law
128 Mott Street, Suite 706
New York, NY 10013
Tel: 212-571-8899
Fax: 212-571-9557
Email: jcesq99@aol.com

July 27, 2011

VIA EMAIL

The Honorable Dennis M. Cavanaugh
United States District Judge
Martin Luther King, Jr. Federal Building and U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

Re: United States v. Alaa El Saadawi
07 CR 560 (DMC)

Dear Judge Cavanaugh:

I write to request a modification of the bail conditions set in the above-captioned matter in order to allow Alaa El Saadawi to travel to Egypt for six weeks. He has not seen his parents, who are quite elderly, in more than ten years, and has not visited his native Egypt I think in fourteen years. Mr. El Saadawi, who recently entered a plea of guilty to Making False Statements in a Citizenship Application, was continued on bond in the sum of \$100,000 secured by property owned by his father-in-law and the signatures of 3 co-signors, as well as travel restrictions. He has been supervised by Pre-Trial Services Officer Angel Matos since his release, and has been fully compliant with his release conditions.

Your Honor may recall that Mr. El Saadawi has twice been permitted to travel to Saudi Arabia during the pendency of this case while facing a substantially higher sentence than he does now, according to his plea agreement and the Advisory Sentencing Guidelines. I have discussed this proposed trip both with AUSA Andrew Kogan and with Pre-Trial Services

The Honorable Dennis M. Cavanaugh
United States District Judge
Re: Alaa El Saadawi
Page two

Officer Angel Matos; neither has any objection to this application being granted. In accord with a request by Mr. Matos, we will provide detailed flight and residence information, as well as the names of his parents to him prior to Mr. El Saadawi's departure in the event this application is granted. Of course if Mr. El Saadawi is permitted to travel than Pre-Trial shall provide him with his passport, which Mr. El Saadawi will surrender to Mr. Matos within 24 hours of his return to the United States. If Your Honor approves the trip please sign the endorsement below. Thank you.

Very truly yours,



Joel S. Cohen (JC6998)

cc: Andrew Kogan, AUSA
Angel Matos, Pre-Trial Services Officer

The above application is granted.

SO ORDERED:

7/28/11


Dennis M. Cavanaugh
U.S. District Judge